

FILED 21 MAR '25 12:25 USDC-ORP

1 CATHANNA SNYDER (Full Name)  
 2 ROSENTHAL  
 3 WMIRESTORATION @ (Email Address)  
 4 6MAIL.COM  
 5 713 CR57 (Address Line 1)  
 6 ABBEVILLE, AL 36310 (Address Line 2)  
 7 907-388-5147 (Phone Number)

8 Plaintiff in Pro Per

9 UNITED STATES DISTRICT COURT  
 10 OREGON, PORTLAND DIVISION

11 CATHANNA SNYDER ROSENTHAL  
 12 PARENT OF

13 PHILIP MATTHEW SNYDER,  
 14 DECEASED  
 15 Plaintiff,

Case No.: 3:25-cv-484-SB  
 (To be supplied by the Clerk)

16 vs. OFFICER TALLON JOHNSTON  
 17 OF CLACKAMUS COUNTY SHERIFF DEPT.  
 18 SHERIFF ANGELA BRADENBURG  
 19 OF CLACKAMUS CO. SHERIFF'S DEPT.

Civil Rights Complaint Pursuant to  
 42 U.S.C. § 1983 (non-prisoners)

20 The CLACKAMUS COUNTY SHERIFF'S  
 21 DEPARTMENT  
 22 of the COUNTY OF CLACKAMUS, OREGON  
 23 Defendant(s).

Jury Trial Demanded: ☒ Yes ☐ No

(All paragraphs and pages must be numbered.)

**I. JURISDICTION**

1. This court has jurisdiction under 28 U.S.C. § 1331 and 28 U.S.C. § 1343.  
 Federal question jurisdiction arises pursuant to 42 U.S.C. § 1983.

**II. VENUE**

2. Venue is proper pursuant to 28 U.S.C. § 1391 because A CIVIL ACTION  
MAY BE BROUGHT IN A DISTRICT WHERE THE EVENTS  
AND VIOLATIONS OCCURED.

11/1/73

1.

**III. PARTIES**

3. Plaintiff CATHIANNA SNYDER ROSENTHAL resides at:  
(your full name)

713 CR 57 ABBEVILLE, ALABAMA 36310

(your address)

(You should specifically identify each Defendant you intend to sue in a separate, numbered paragraph.)

4. Defendant OFFICER TALLON JOHNSTON works at  
(full name of Defendant)

CLACKAMUS COUNTY SHERIFF'S DEPARTMENT, OREGON

(Defendant's place of work)

Defendant's title or position is OFFICER

(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☐ individual capacity

☒ official capacity

This Defendant was acting under color of law because: HE RESPONDED TO

PHILIP SNYDERS MEDICAL/MENTAL BREAKDOWN/CRISIS

MARCH 22, 2023 ACTING FOR CLACKAMUS SHERIFFS DEPT.  
EXERCISING AUTHORITY, USING RESOURCES, RESPONDING.

5. Defendant SHERIFF ANGELA BRADENBURG works at

(full name of Defendant)

CLACKAMUS COUNTY SHERIFFS DEPARTMENT, OREGON

(Defendant's place of work)

Defendant's title or position is SHERIFF

(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☐ individual capacity

☒ official capacity

This Defendant was acting under color of law because: SHE IS THE

SUPERVISOR/DIRECTOR OFFICIALLY ACTING OVER

AND FOR CLACKAMUS COUNTY SHERIFFS DEPT., OR.  
ENFORCING COUNTY POLICIES, PROCEDURES & PRACTICES.

2.

Page Number



6. Defendant CLACKAMUS COUNTY SHERIFFS DEPARTMENT works at  
Insert ¶ # (full name of Defendant)

CLACKAMUS COUNTY SHERIFFS DEPT. CLACKAMUS, OREGON.  
(Defendant's place of work)

Defendant's title or position is ENTIRE SHERIFFS DEPT.  
(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☐ individual capacity

☒ official capacity

This Defendant was acting under color of law because IT IS OFFICIALLY  
 ACTING AS THE SHERIFFS DEPT., CLAIMING AUTHORITY  
 GRANTED BY CLACKAMUS COUNTY AND THE STATE  
 OF OREGON AND THEIR RESOURCES, POLICIES & PROCEDURES

7. Defendant <sup>the</sup> MUNICIPALITY/COUNTY OF CLACKAMUS works at  
Insert ¶ # (full name of Defendant) OREGON

CLACKAMUS COUNTY, OREGON CITY, OR.  
(Defendant's place of work)

Defendant's title or position is CLACKAMUS COUNTY  
(Defendant's title or position at place of work)

This Defendant is sued in his/her (check one or both):

☐ individual capacity

☒ official capacity

This Defendant was acting under color of law because IT EXERCISES  
 POWER OR AUTHORITY; AUTHORIZATION THAT  
 IT POSSESSES BY VIRTUE OF GOVERNMENTAL  
 POSITION.

#### IV. STATEMENT OF FACTS

(Explain what happened in your own words. You do not have to cite legal authority in this section. Be specific about names, dates, and places. Explain what each Defendant did. Remember to number every paragraph.)

8. ON MARCH 22nd, 2023. CLACKAMUS COUNTY

Insert ¶ #

SHERIFF'S DEPT. RESPONDED TO A 911 CALL. OFFICER T. JOHNSTON ARRESTED/DETAINED PHILIP SNYDER AND CHARGED HIM WITH "DISORDERLY CONDUCT". IN FACT, PHILIP WAS IN STAGE 4 MENTAL/MEDICAL CRISIS. HE WAS IN NEED OF IMMEDIATE, EXPERT MEDICAL, PSYCHIATRIC INTERVENTION. HE WAS THREATENING

9. DEATH AND SUICIDE, PUBLICALLY IN FRONT

Insert ¶ #

OF A TARGET STORE, HAPPY VALLEY, OR. IN FACT, PHILIP SUFFERED FROM T.B.I. (TRAUMATIC BRAIN INJURY) SINCE AGE 14., PLUS MULTIPLE OTHER TRAUMAS. IN FACT, HE HAD DECOMPENSATED TO THE CONDITION THAT HE COULD NO LONGER BE SAFE IN PUBLIC. HE HAD NO SHELTER, NO PHONE, AND WAS ENDANGERED AND ACTING OUT.

10. AND HAD BEEN LISTED AS A MISSING

Insert ¶ #

PERSON FOR 3 MONTHS. THE SHERIFF'S DEPT. KNEW HE WAS LISTED AS MISSING AND HAD FOUND HIM FEB. 11<sup>th</sup>, 2023 IN THEIR COMMUNITY WHERE HE CLAIMED TO LIVE AT A PARK. PHILIP HAD LEFT TENNESSEE TO GO TO THE OREGON COAST TO DO FISHING WORK WITH FRIENDS. HE WOUND UP HOMELESS IN CLACKAMUS COUNTY IN CRISIS, UNABLE TO STABILIZE. WE DON'T KNOW WHAT HAPPENED.



11. DUE TO THE PRACTICES, POLICIES, CUSTOMS  
AND TRAINING / LACK OF TRAINING OF THE  
CLACKAMUS COUNTY ACTING UNDER COLOR OF LAW,  
OFFICER JOHNSTON TOOK PHILIP TO JAIL. HE  
RECEIVED NO MEDICAL / EXPERT INTERVENTION  
AND WAS RELEASED IN THE SAME ORDER, IN A  
DAY. PHILIP'S BODY WAS FOUND IN A FIELD/  
LOT IN HAPPY VALLEY, OR. HE DIED THE DAY

12. OF RELEASE OR THE NEXT DAY ACCORDING  
TO THE MEDICAL EXAMINER. LOCALS SAW A  
PERSON WALKING THROUGH THE NEARBY LOT  
WITH A BLANKET OVER HIS HEAD. THE DASH  
CAM ARREST FOOTAGE SHOWS PHILIP IN DEEP  
DISTRESS COVERING HIS HEAD. WITNESSES  
REPORTED SEEING SEVERAL PEOPLE IN THE  
FIELD AT THE DEATH SCENE AT NIGHT WITH

13. FLASHLIGHTS. THIS WAS NOT FOLLOWED UP  
IN INVESTIGATION. THE MEDICAL EXAMINER  
ESTIMATES CAUSE OF DEATH - FENTANYL.  
TOXICOLOGY REVEALED IT IN HIS BLOODSTREAM.  
I, PHILIP'S MOTHER, STARTED  
GATHERING REPORTS ETC. AFTER HIS MEMORIALS.  
I SPOKE WITH OFFICER JOHNSTON WHO TOLD  
ME THAT PHILIP WAS THREATENING DEATH  
ON MAR. 22, 2023 AND THAT HE HAD TAKEN

14. HIM TO THE HOSPITAL, THEN SAID "I'M SORRY"

Insert ¶ #

AND HUNG UP THE PHONE. I HAVE WITNESSES.

PHILIP WAS ARRESTED MARCH 22, 2023. HE

DIED THE DAY OF RELEASE OR THE NEXT.

MARCH 23 OR 24, 2023 IN A FIELD OR LOT

IN HAPPY VALLEY, OR. THE REPORT STATES

TIME OF DEATH UNKNOWN.

OFFICER JOHNSTON LIED TO DECEIVE ME.

15. HE KNOWS HE NEEDED TO TAKE HIM

Insert ¶ #

FOR EVALUATION, CARE. I BELIEVED THAT

PHILIP HAD GONE TO THE HOSP. AL (WHERE

HE WOULD HAVE BEEN TREATED / EVALUATED BY

A MEDICAL EXPERT. PHILIP WAS UNSAFE TO

HIMSELF AND POTENTIALLY OTHERS. YET PUT

BACK OUT ON THE STREETS IN THE COMMUNITY

IN THE SAME CRISIS CONDITION.

16. I FLEW INTO PORTLAND, OR ON OCT.

Insert ¶ #

28<sup>th</sup>, 2024. TO GATHER HOSPITAL INFORMATION

ON PHILIP'S TREATMENT / CARE. AND TO VISIT

THE SITE OF HIS DEATH. SOMETIME AROUND

MIDNIGHT, I CALL CLACKAMUS COUNTY

SHERIFFS DEPT. THE LEAD NIGHT CAPTAIN

CALLED ME BACK. AFTER SOME CONVERSATION,

I ASKED FOR THE NAME OF THE HOSPITAL

PHILIP WAS TAKEN TO.



17. HE INFORMED ME THAT PHILIP WAS, IN FACT,  
<sup>Insert ¶ #</sup>  
NOT TAKEN TO A HOSPITAL BUT TO A JAIL.  
THE REPORTS SHOW NO MEDICAL/MENTAL INTER-  
VENTION/EVALUATION BY ANY EXPERT. PHILIP  
WAS RELEASED IN THE SAME CRITICAL CONDITION  
IN A DAY. A "STAGE FOUR" MEDICAL, MENTAL  
CRISIS HAD BEEN DISMISSED OR COVERED BY  
THE LABEL OF DISORDERLY CONDUCT.

18. IN FACT, PHILIP WAS DEPRIVED, UNDER  
<sup>Insert ¶ #</sup>  
COLOR OF LAW BY THE DEFENDANTS ACTING  
UNDER COLOR OF LAW, OREGON OF MANY U.S.  
HUMAN/CITIZEN RIGHTS INCLUDING THOSE  
PRIVILEGES AND IMMUNITIES PROVIDED BY  
THE 14<sup>th</sup> AND 8<sup>th</sup> AMENDMENTS of the  
U.S. CONSTITUTION. THIS DEPRIVATION,  
INJUSTICE, CRUELTY, INDIFFERENCE, FAILURE

19. DENIAL AND ABANDONMENT IS/WAS A  
<sup>Insert ¶ #</sup>  
DIRECT RESULT OF THE POLICIES, USAGE,  
CUSTOMS, PRACTICES, TRAINING/LACK, INACTION,  
ACTION, SUPERVISION/LACK OF THE COUNTY  
OF CLACKAMUS, OREGON AND THE DEFENDANTS  
THESE DEPRIVATIONS RESULTED IN THE  
DEATH OF U.S. CITIZEN, SON, FATHER AND  
BELOVED PHILIP MATTHEW SNYDER BORN  
SEPTEMBER 11, 1984.

V. CLAIMSClaim #1

A. Plaintiff realleges and incorporates by reference all of the paragraphs above.

Insert ¶ #

B. Plaintiff has a claim under 42 U.S.C. §1983 for violation of the following

Insert ¶ # federal constitutional or statutory civil right:

14<sup>th</sup> AMENDMENT SECT 1: DUE PROCESS

14<sup>th</sup> AMENDMENT SECT 1: EQUAL PROTECTION

8<sup>th</sup> AMENDMENT: UNUSUAL PUNISHMENT

C. The above civil right was violated by the following Defendants:

Insert ¶ #

OFFICER TALLON JOHNSTON, SHERIFF ANGELA  
BRADENBURG, CLACKAMUS COUNTY SHERIFF DEPT.

COUNTY/MUNICIPALITY OF CLACKAMUS COUNTY OREGON

(You may list facts supporting your claim. Be specific about how each Defendant violated this particular civil right.)

D. SEE THE FACT SHEET / STATEMENTS

Insert ¶ #

THE DEFENDANTS' CONDUCT, POLICIES, PRACTICES,  
USAGE, CUSTOMS, TRAINING/LACK OF, SUPERVISION /  
LACK OF, DISCIPLINARY HISTORY AND HABITS ACTING  
UNDER THE COLOR OF LAW DEPRIVED PHILIP  
SNYDER OF HIS CONSTITUTIONAL RIGHTS,  
PRIVILEGES AND IMMUNITIES

E. As a result of the Defendant's violation of the above civil right, Plaintiff  
was harmed in the following way:

Insert ¶ #

INJUSTICE, ABANDONMENT, NEGLECT, VIOLATION,  
DENIAL, CRUELTY, INDIFFERENCE, REFUSAL  
AND DEATH



VI. REQUEST FOR RELIEF

WHEREFORE, the Plaintiff requests:

1. COMPENSATION FOR LOSS OF LIFE,  
 Insert ¶ # EMOTIONAL STRESS AND LOSS OF FAMILY  
RELATIONSHIPS, LOSS OF POTENTIAL EARNING  
POWER (HE HAS CHILDREN) FOR A SUM OF  
TWO MILLION DOLLARS. \$2,000,000.00

2. COMPENSATION FOR ATTORNEY FEES  
 Insert ¶ # AND COURT COSTS, ATTENDANCE COSTS  
FOR MYSELF (REPRESENTATIVE) AND  
ALL UPCOMING, ONBOARDING ATTORNEYS

3. PUNITIVE DAMAGES FOR THE COUNTY  
 Insert ¶ # SHERIFF DEPT OFFICIALS DELIBERATE  
DECEPTION CONCERNING PHILIP'S "HOSPITAL  
CARE, FOR A SUM OF \$100,000.00  
THIS CAUSED PAIN AND DELAY OF 1.5 YRS.

4. CLACKAMUS COUNTY SHERIFF DEPT AND  
 Insert ¶ # ALL OTHER COUNTY RECORDS RELEASE ALL  
BODY CAM RECORDS TO ME(US). THEY CLAIM  
IT HAS TO BE SUPOENAED. I ALREADY PAID  
FOR RECORDS AND CONTINUALLY ASKED FOR ALL.

Dated: MARCH 20, 2025

Sign: Cathianna J. Rosenthal

Print Name: Cathianna Snyder Rosenthal

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Page Number

**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: MARCH 20<sup>th</sup>, 2025

Sign: Cathianna Snyder Rosenthal

Print Name: CATHIANNA SNYDER ROSENTHAL